

Sirlute Privacy Policy

Last updated: July 2026

Who we are

Sirlute is a Charitable Incorporated Organisation registered with the Charity Commission for England and Wales, charity number 1188822.

We are the "data controller" for the personal information described in this policy. That means we decide what information is collected and how it is used, and we are responsible for looking after it.

Registered office: Unit 16, 21 City Island Way, London E14 0QE **Studios:** 7 Botanic Square, Leamouth Peninsula, London E14 0LG **Email:** info@sirlute.com **Phone:** 020 7459 4784

If you have any question about this policy or about how we handle your information, contact J.R Josephs, Chief Executive Office: jr@sirlute.com

Sirlute's ICO registration number: 1188822

A note for young people

If you're under 18 and signing up to a Sirlute programme, this page explains what we do with your information. The short version:

- We ask for your details so we can run programmes safely and get in touch with you.
- We ask for a parent or carer's details if you're under 18, so we can reach someone if you're unwell or something happens.
- We only share your information when we have to, with a school or organisation that referred you, or if we're worried about your safety.
- We never sell your information to anyone.
- You can ask us what we hold about you and ask us to correct or delete it.
- You can say no to photos and videos, and that will not stop you taking part.

If any of this doesn't make sense, ask any member of Sirlute staff, and we'll explain it properly.

The information we collect

If you take part in a programme

- Name, date of birth, address, phone number and email
- Parent or carer name and contact details, if you are under 18
- Emergency contact details
- The programme you've applied for and your attendance
- Medical information, allergies, and any additional needs or access requirements
- Whether you have any dietary requirements
- Information about your background — for example ethnicity, gender, whether you have a disability, and whether you're in receipt of free school meals or supported by other services

We ask for the last group because our funders require us to show who we're reaching, and because we need to know whether we are actually serving the young people we exist to serve.

You do not have to answer these questions, and choosing not to will never affect your place on a programme.

If you are referred to us

Where a school, pupil referral unit, youth offending team, local authority, health service or other organisation refers a young person to us, they may share relevant information with us, including the reason for the referral and any risk, safeguarding or support needs we need to know about to keep that young person safe.

If you donate

- Name, address, email and phone number
- Donation amount, date and payment method
- Gift Aid declaration and whether you are a UK taxpayer

Donations made through JustGiving are processed by JustGiving, who have their own privacy policy. **We never see or store your full card details.**

If you book an event

- Name, email and phone number
- Booking and ticket details
- Any access requirements you tell us about

If you contact us, subscribe, or apply for a job

- Your name and contact details, and whatever you choose to tell us in your message
- For job applicants: your CV, application, references and right to work information

When you use our website

Our website is built on Wix, which sets cookies to make the site work and to help us understand how it's used. We also use analytics to see which pages people visit. You can control cookies through the banner when you first visit, and through your browser settings.

Why we use your information, and our lawful basis

UK data protection law requires us to have a "lawful basis" for using your information. Ours are set out below.

What we use it for	Lawful basis
Running programmes, taking sign-ups and managing attendance	Legitimate interests, delivering our charitable purpose
Keeping young people safe, including safeguarding and emergencies	Legal obligation, and vital interests where someone is at risk
Medical, dietary, additional needs and ethnicity information	Explicit consent, and substantial public interest for safeguarding purposes
Reporting to funders on who we've reached	Legitimate interests, meeting our funding obligations
Processing donations and claiming Gift Aid	Contract and legal obligation
Sending newsletters and marketing	Consent
Photography and video of participants	Consent
Recruitment	Legitimate interests, and legal obligation for right to work checks

Photography and film: we ask separately for consent to take and use photographs and video, and to name a young person in our materials. It is entirely optional, you can withdraw it at any time, and refusing has no effect on taking part.

Who we share it with

We share personal information only where we need to. We do **not** sell it, rent it, or share it for anyone else's marketing.

- **Referring organisations:** schools, pupil referral units, youth offending teams, local authorities and support services, where they referred a young person to us and need to know about attendance or progress
- **Delivery partners:** colleges, universities and creative organisations delivering programmes with us, where they need participant details to run the session safely
- **Safeguarding authorities:** children's social care, the police or other agencies, where we believe a child or adult is at risk of harm. We do not need consent to do this, and we may not always be able to tell you in advance
- **Funders:** usually as anonymous, aggregated numbers. Where a funder requires individual-level data, we will tell you
- **Service providers:** Wix (website and forms), JustGiving (donations), and our email, analytics and finance providers. They act on our instructions and cannot use your information for their own purposes
- **HMRC:** for Gift Aid claims
- **Professional advisers, auditors and regulators:** including the Charity Commission, where required

Some of our providers store data outside the UK. Where they do, we make sure appropriate safeguards are in place as required by UK data protection law.

How long we keep it

Type of record	Suggested retention
Participant records	6 years after last contact, or until the young person turns 25, whichever is later
Safeguarding and child protection records	Retained long-term in line with statutory guidance and IICSA recommendations
Consent forms, including media consent	For as long as the related record is held
Donation and Gift Aid records	7 years, as required by HMRC
Newsletter subscribers	Until you unsubscribe
Job applications from unsuccessful candidates	12 months
Event bookings	2 years
CCTV, if in use at our premises	[TO CONFIRM]

How we keep it safe

- Access is limited to staff and volunteers who need it to do their job
- Everyone working with young people is enhanced DBS checked and trained in data protection and safeguarding
- Records are held in access-controlled systems, not personal devices or personal email
- Staff and volunteers contact young people through Sirlute accounts and channels only, never personal phone numbers or personal social media
- We review who has access when people join and leave

If a data breach occurs that is likely to affect your rights and freedoms, we will report it to the Information Commissioner's Office within 72 hours and inform you, where required.

Your rights

You have the right to:

- **Be told** what we do with your information, that's this policy
- **Ask for a copy** of the information we hold about you
- **Have it corrected** if it's wrong
- **Ask us to delete it**, though we may not be able to where we have a legal or safeguarding reason to keep it
- **Object to** or **restrict** how we use it
- **Withdraw consent** at any time, where we relied on consent, including photo and media consent
- **Ask for your information in a portable format**

A young person who is old enough to understand their rights can exercise them themselves. In practice we treat 13 as the age at which a young person can generally act for themselves online, but we consider each situation individually. Parents and carers can exercise these rights on behalf of younger children.

To exercise any of these, email jr@sirlute.com. We will respond within one month.

If you're unhappy with how we've handled your information, tell us first and we'll try to put it right. You also have the right to complain to the **Information Commissioner's Office** at ico.org.uk, or on 0303 123 1113.

Changes to this policy

We review this policy at least annually. Where we make significant changes, we will say so on this page and update the date at the top.
